

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JOHNJUAN WHITE,

PLAINTIFF,

v.

DAUPHIN COUNTY, ET AL.

DEFENDANTS.

No. 1:22-cv-01241-CCC

Electronically filed Document

**STIPULATION OF COUNSEL FOR DISMISSAL OF ALL
DEFENDANTS PURSUANT TO F.R.C.P. 41.1(b).**

The undersigned parties, by and through their respective counsel, hereby agree and stipulated pursuant to Fed. R. Civ. P. 41.1(b) that all claims as asserted against all defendants in this action are hereby DISMISSED WITH PREJUDICE, without costs and each side bearing their own attorneys' fees.

Dated: July 16, 2024

/s/ Leticia C. Chavez-Freed
Leticia C. Chavez-Freed, Esq.
PA Bar ID 323615
The Chavez-Freed Law Office
2600 N. 3rd Street, 2nd Floor
Harrisburg, PA. 17110
(717) 893-5698
leticia@chavez-freedlaw.com
Counsel for Plaintiff

/s/ Alan Denenberg
Alan Denenberg Esq.
Abramson & Denenberg, PC
1315 Walnut Street
Suite 500
Philadelphia, PA
(215) 398-7066
leticia@chavez-freedlaw.com
Counsel for Plaintiff

/s/ John Ninosky
John R. Ninosky, Esq.
Marshall Dennehey, PC
200 Corporate Center Dr.
Suite 300
Camp Hill, PA 17011
(717) 651-3709
leticia@chavez-freedlaw.com
Counsel for Defendants PrimeCare, et

/s/Donald Carmelite
Donald L. Carmelite Esq.
Marshall Dennehey, PC
200 Corporate Center Dr.
Suite 300

Camp Hill, PA 17011
(717) 651-3504
[DLCarmelite@MDWCG.com](mailto: DLCarmelite@MDWCG.com)
*Counsel for DCP-Individual
Defendants.*

/s/ Frank J. Lavery
Frank J. Lavery Esq.
Lavery Law, P.C.
225 Market St.
Suite 304
Harrisburg, PA. 17101
(717) 233-6633
[Flavery@LaveryLaw.com](mailto: Flavery@LaveryLaw.com)
*Counsel for Dauphin Cty. Prison
Defendants.*